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JUN 17 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

June 17, 1993

OUR FILE NO.
1008-101-63

Donna R. Searcy, Secretary
Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

RE: MM Docket No. 93-114
RM-7772

Dear Ms. Searcy:

Transmitted herewith on behalf of Findlay Television Corporation
are an original and nine copies of the **COMMENTS OF FINDLAY
TELEVISION CORPORATION** regarding the above-referenced.

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Before The

welcomes the FCC's proposal to ease the processing restrictions applicable to Low Power Television (LPTV) applications and, particularly, the FCC's proposal to allow LPTV stations to use four letter call signs.

Four Letter Call Signs

2. In the *NPRM*, at paragraph 23, the Commission proposes to allow LPTV stations to use four letter call signs with the suffix "LP." While Findlay urges the Commission to adopt four letter call signs for LPTV stations, it does not favor the "LP" suffix.

3. Findlay TV favors the use of four letter call signs for LPTV stations. The listening public and advertisers are confused by the call signs for LPTV stations as they currently exist, with the initial "W" or "K", channel number and two-letter combination. They are accustomed to four letter calls for radio and television stations and do not understand the alpha-numeric designation for LPTV stations. When questioned, LPTV stations must explain their low powered status, which belittles them and their service in the eye of advertisers.² As a result, Findlay TV would welcome a change in the rule to allow LPTV stations to use four letter call signs.

4. For the same reason that Findlay TV favors the change from alpha-numeric calls to four letter call signs, Findlay TV opposes the use of the "LP" suffix. Being described as "low power" is a marketing nightmare. While Findlay TV's technical power output is lower than many "full service" television stations, its broadcast service and

² Having the label "community television" as opposed to "low power" would go a long way in helping to market LPTV to the public, advertisers, and cable operators on whose systems LPTV stations are seeking carriage.

programming on W47BD is anything but low powered. Using the "LP" suffix only highlights to the public and to advertisers the low powered nature of W47BD's class of station contrary to Findlay TV's efforts to bring a truly community-oriented television service to Findlay, Ohio.

5. Findlay TV can understand that the FCC may need a means of distinguishing LPTV four letter call signs from AM, FM or full service television call letters, but urges the Commission to use a suffix other than "LP." Using "CT" for community television as a parenthetical, as is done for FM stations where the four letter call sign is not used by another AM or TV station, would be preferable to "LP." When the four letter call sign is already in use by another station in a difference service, a hyphen could be inserted between the call letters and "CT."

Processing Rules

6. The Commission has also solicited comments on its processing rules. Findlay TV favors the Commission's proposal to modify its application acceptance standard outlined in paragraphs 7 through 9 of the *NPRM*. Essentially, the acceptance standard for new or major change applications would be changed from a "letter perfect" standard to a "substantially complete" standard. Findlay TV approves of the more lenient standard because it would allow applicants to correct minor defects without having to wait to refile another application when a filing window opens. The delay in having to refile a major change application during another window period that opens at some unknown time in the future can become costly from a business standpoint. The opportunity

to reduce the delay in making changes to LPTV facilities can only help the LPTV operator.

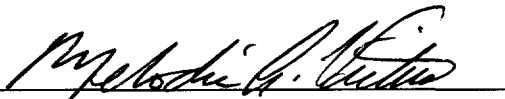
7. Because major modifications can only be filed during window periods, Findlay TV also supports the proposed rule change to narrow the definition of a major modification as set forth in paragraphs 16 through 19 of the *NPRM*. To summarize, the FCC plans to change the boundary within which an LPTV station could make what would be considered minor coverage modifications from their existing protected service contour to a circle the radius of which is the greatest distance between the transmitting site to the furthest point of the LPTV's existing protected service contour. The proposed rule change would allow LPTV stations greater flexibility to make coverage changes under the rules governing minor modifications without having to wait for the FCC to open a filing window.

WHEREFORE, the premises considered, Findlay TV Corporation respectfully requests that the Commission adopt the proposed rule changes to relax the processing rules and to permit four letter call signs as discussed above.

Respectfully submitted,

FINDLAY TELEVISION CORPORATION

By


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